

Reviewing Your State's Eligible Training Provider (ETP) List Policy

A Desk Aide for OA/SAA Staff

Read the State ETPL Policy and answer the following questions:

		Y	N
1	Does the policy reference 'registered apprenticeship' instead of just 'apprenticeship?' <i>Only registered programs are entitled to the exceptions specified in the WIOA statute at Sec. 122.</i>		
2	Does the policy include the following exception for registered apprenticeship programs: NO performance requirements? <i>Even if the policy says that performance requirements are 'minimal,' that is incorrect. There are <u>no</u> performance-related requirements for registered apprenticeship programs. For instance, the six metrics that are required for the core programs do not pertain to registered apprenticeship programs.</i>		
3	Does the policy include the following exception for registered apprenticeship programs: NO reporting requirements? <i>Registered apprenticeship programs do not have to provide reports or otherwise provide ongoing information to the state or local boards. The only requirement is that they remain registered (which ideally should be conveyed to the state by the State Director).</i>		
4	Does the policy state why registered apprenticeship programs are entitled to these exceptions? <i>For instance, many policies quote the same language that's in TEGL 41-14 "...because they go through a detailed application and vetting procedure to become a Registered Apprenticeship program sponsor with the [USDOL] or the [SAA]." Ideally, however, the policy will do more than repeat the same policy language (e.g., programs are monitored on a regular basis by apprenticeship staff...).</i>		
5	Does the policy limit the information requirements for program sponsors to the five (5) items listed in TEGL 41-14? <i>These items are on page 9 of TEGL 41-14. 1) Occupations included; 2) Name/address of program sponsor; 3) Name/ address of RTI provider and location of instruction if different from sponsor's address; 4) Method and length of instruction; and 5) Number of active apprentices. Note that asking for information on cost is going beyond the requirements; the only time cost should be required is if the provider of the RTI is not the program sponsor. Note also that it is not appropriate (and not a good practice) for policies to ask sponsors to prove their status by submitting a Certificate of Registration; that could easily come from the State Director as needed.</i>		
6	[N/A for single area states] Does the policy explicitly state that registered apprenticeship programs on the statewide ETPL should be on every local ETPL? <i>This is the intent and expectation, although there has been some confusion in the workforce system on this particular point because local boards have their own 'due diligence' related to ETPs, such as whether or not the occupation is an in-demand occupation. (See #9.)</i>		
7	Does the policy explicitly state that Local Boards and/or One-Stop Operators are NOT to impose additional requirements on registered apprenticeship program sponsors? <i>In the real world, if the local board or Operator need some type of information like the FEIN in order to make payment, that is clearly okay because it's needed and not burdensome. However, some local boards have imposed additional requirements that are burdensome to satisfy their own ETP requirements that have been in place for more than a decade under WIA.</i>		
8	Does the policy reference the State Director of Apprenticeship and/or the state unit responsible for registered apprenticeship? <i>For instance, does it reference working in concert with OA/SAA staff, collaborating on a process for adding new programs to the list, verifying registration status periodically, contacting the State Director or other apprenticeship staff for questions on registered apprenticeship?, etc.)</i>		
9	Does the policy specify that, by definition, a registered apprenticeship program that is taking applications is to be considered an in-demand occupation? <i>Local boards are required by the statute to provide training only in "in-demand occupations" prior to training approval. Unfortunately, this has had the unintended consequence of local list denials, additional paperwork, and the like. Having the policy explicitly state that programs taking applications should automatically be considered 'in-demand' would be ideal.</i>		